



December 17, 2020

John L. Ciarelli, Esq.  
Of Counsel  
[jciarelli@kccllp.net](mailto:jciarelli@kccllp.net)

Hon. Joan M. Azrack  
United States District Judge  
United States District Court, Eastern District of New York  
100 Federal Plaza  
Central Islip, New York 11722

Re: Schroeder v. Polish-American Political Club of Southampton,  
N.Y., Inc., and 230 Elm LLC  
Civil Action No.: 18-CV-2279(JMA)(AYS)

Dear Judge Azrack,

We represent the Defendant Polish-American Political Club of Southampton Inc., (PAPC). As its name suggests, PAPC functioned as a private social club at the premises. It was formed by a group of Polish-Americans in the 1920s. PAPC is a volunteer run organization. To assist with the cost of maintaining its building, the PAPC rented part of the building to the defaulting 230 Elm LLC, a caterer, for private events.

PAPC and the Plaintiff acted in pursuit of settlement from the inception of the litigation. In July 2020 the undersigned, in furtherance of previous efforts to resolve this matter, forwarded a proposed settlement agreement to the attorney for the Plaintiff. The proposed settlement offers full compliance with applicable ADA requirements. The Plaintiff's attorney recently responded that the proposed settlement is under consideration. We would like the latitude to pursue such settlement as it presents a practical resolution.

Respectfully yours,

KOSAKOFF & CATALDO LLP

By:  0689

JOHN L. CIARELLI, ESQ., OF COUNSEL

JLC

Cc: James Bahamonde by ECF